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16 *Ultimate Fighting Championship and UFC*

17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA

19
20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
25 Championship and UFC,

26 Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**ZUFFA, LLC'S REPLY IN
SUPPORT OF ITS MOTION TO
SEAL PORTIONS OF ZUFFA,
LLC'S OPPOSITION TO
PLAINTIFFS' MOTION TO
CHALLENGE ATTORNEY-
CLIENT PRIVILEGE (ECF NO.
320) AND RELATED EXHIBITS**

1 Once again, Plaintiffs oppose a motion to seal filed by Defendant Zuffa, LLC (“Zuffa”) on
2 the ground that certain of the documents at issue are not privileged. In addition, Plaintiffs again
3 improperly attempt to reargue the merits of why those documents are not privileged. As with
4 their last opposition to Zuffa’s motion to seal, ECF No. 327, Plaintiffs “take no position as to
5 whether these documents contain confidential information” and do not oppose Zuffa’s motion to
6 seal on that basis, ECF No. 337 at 1.

7 As fully explained in its initial motions to seal, ECF Nos. 324 and 330, and its reply in
8 support of its initial motion to seal Plaintiffs’ attorney-client privilege challenge, ECF No. 332,
9 Zuffa believes that good cause exists to seal Exhibits 1-12 and 19 to the Declaration of Kevin E.
10 Rayhill in Support of Plaintiffs’ Motion to Challenge Attorney-Client Privilege (ECF No. 322-18,
11 the “Rayhill Declaration”) and portions of Exhibit A to the Declaration of Stacey K. Grigsby in
12 Support of Zuffa, LLC’s Opposition to Plaintiffs’ Motion to Challenge Attorney-Client Privilege
13 (“Grigsby Opposition Declaration”) on the basis that those documents are (1) protected by the
14 attorney-client privilege and (2) contain highly confidential and sensitive business information.
15 Zuffa also believes that good cause exists to seal those portions of Plaintiffs’ initial motion
16 challenging privilege and Zuffa’s opposition that reference, quote from, and otherwise disclose
17 privileged and confidential information contained in those documents.

18 As fully explained in ECF Nos. 330, 332, and 324, Zuffa also believes that the highly
19 sensitive and confidential nature of the business information contained in Exhibit 17 to the
20 Rayhill Declaration and in Exhibits B and C to the Grigsby Opposition Declaration justifies
21 sealing those documents in their entirety. In addition, portions of Exhibit A to the Grigsby
22 Opposition Declaration, the Appendix of Exhibits to Zuffa’s opposition, Plaintiffs’ initial motion
23 challenging privilege that reference or quote from Exhibit 17 to the Rayhill Declaration, and
24 Zuffa’s opposition that refer to or quote from Exhibit 17 and Exhibits B-C of the Grigsby
25 Opposition Declaration are properly filed under seal due to their highly sensitive and confidential
26 nature.

27 In any event, Zuffa believes that, regardless of whether the Court finds that some or all of
28 the Challenged Documents are privileged, good cause exists to seal all the documents that Zuffa

requests be filed under seal in whole or in part. Zuffa respectfully renews its request for the Court to find that the aforementioned documents, or portions thereof, are appropriate for filing under seal.

Dated: January 17, 2017

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Stacey K. Grigsby

Stacey K. Grigsby

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **Zuffa, LLC's Reply In Support Of Its Motion To Seal Portions Of Zuffa, LLC's Opposition To Plaintiffs' Motion To Challenge Attorney-Client Privilege (ECF No. 320) And Related Exhibits** was served on January 17, 2017 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Michael Kim

Michael Kim, an Employee of Boies,
Schiller & Flexner LLP